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REMARKS

This response is in reply to the non-final office action in the instant application mailed on March 29, 2007. Claims 1-6 were examined, and stand rejected under 35 USC 112, second paragraph, and under 35 USC 102(e). Method claim 7 is newly presented.

Regarding the rejection under 35 USC 112, second paragraph, Applicants respectfully disagree. Claim 1 recites a system comprising a first and second deionization subsystems, where the remainder of the claim recites how the subsystems interact to form the inventive system as claimed. Claim 2 recites a system comprising a N deionization subsystems represented by  $k=1$  through N, where the remainder of the claim recites how the subsystems interact to form the inventive system as claimed.

Regarding the rejection under 35 USC 102(e), it is respectfully submitted that the cited prior art does not teach the invention as presented in the herein claims. Both independent claims require at least two subsystems. This allows for one of the benefits of the present invention, where the discharge product only has a concentration of, in the case of claim 1,  $C + \Delta_1$  and  $C + \Delta_2$ , which is environmentally safe, as compared to conventional deionization system outputs or brine discharge product, which discharge all of the accumulated byproducts (i.e., which would be, according to convention systems,  $C + (\Delta_1 + \Delta_2)$  in the case of claim 1, and  $C + \sum_{k=1}^N \Delta_k$  in the case of claim 2) thereby increasing the concentration thereof.

In contrast, Tran 6346187 discloses a single unit having a plurality of individual *cells* (see Figure 1). While these may serve as one of the sub-systems in the present invention, Tran in

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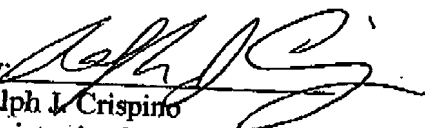
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no way discloses individual subsystems, therefore it is impossible for there to be the interrelationship between the subsystems involving the concentration ranges.

Furthermore, Andelman 5620597 discloses several variations of units formed of plural *cells*. In addition, a figure is shown (Figure 15) with a pair of capacitor systems. However, while there is some discussion that the capacitors may be connected in parallel *or* in series, there is no discussion of a system like those in the present claims 1 and 2, where the subsystems operate in series *and* in parallel. More particularly, in the charging mode, the subsystems operate in series, and in the discharging mode, the subsystems operate in parallel, thereby attaining the aforementioned environmental benefits related to decreased discharge concentration, since only one stage of deionization is discharged from each subsystem.

No new matter is presented herein. Favorable action is earnestly solicited.

Respectfully submitted,

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